

Message

From: Grifo, Francesca [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8C4870BFAB004FA0AC47BC8659D9903B-GRIFO, FRAN]
Sent: 8/25/2021 1:37:33 AM
To: Trenkle, William - OSEC Washington, DC [william.trenkle@usda.gov]
Subject: RE: Scientific Integrity loss

Hey –

Ex. 5 Deliberative Process (DP)

Francesca

Francesca T. Grifo, Ph. D.
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<http://www.epa.gov/osa/basic-information-about-scientific-integrity>

From: Trenkle, William - OSEC Washington, DC <william.trenkle@usda.gov>
Sent: Tuesday, August 24, 2021 5:43 PM
To: Robinson, Craig R <crrobinson@usgs.gov>; Grifo, Francesca <Grifo.Francesca@epa.gov>; Anne.Ricciuti@ed.gov;
Ex. 6 Personal Privacy (PP)
Cc: Ex. 6 Personal Privacy (PP)
Subject: Scientific Integrity loss

Dear CoChairs,

Ex. 5 Deliberative Process (DP)

I offered some additional comments in the text.

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Respectfully,
Bill

As an additional information source for Chapter 2, here is how USDA defines breaches/loss/compromise of Scientific Integrity (highlighted) and our Code of Scientific Ethics. You will also note that our definition includes exclusions of what is *NOT* covered by the Departmental Regulation/Manual. I would also mention that the Departmental Regulation states the affirmative positions to maintain a culture of scientific integrity as the Policies of the department in the DR (which are then listed in a negative format for the “compromises”).

Departmental Manual (DM) “PROCEDURES FOR RESPONDING TO ALLEGATIONS OF COMPROMISED SCIENTIFIC INTEGRITY” link: <https://www.ocio.usda.gov/document/departamental-manual-1074-001>
PDF direct: <https://www.ocio.usda.gov/sites/default/files/docs/2012/Final%20-%20DM%201074-001%20Scientific%20Integrity.pdf>

Scientific Integrity (9bb) and Compromises of Scientific Integrity (9bb1) are described on pg 40-41 of the DM PDF, see below:

9bb. Scientific Integrity. The condition resulting from adherence to professional values and practices when conducting, reporting, and applying the results of scientific activities that ensures objectivity, clarity, and reproducibility, and that provides insulation from bias, fabrication, falsification, plagiarism, inappropriate influence, political interference, censorship, and inadequate procedural and information security.

(1) Compromise of Scientific Integrity. The loss or breach of scientific integrity in the conducting or reporting of scientific activities, and/or the use or application of the results of scientific activities. Compromised scientific integrity includes, but is not limited to:

- (a) Using scientific products that are not representative of the current state of scientific knowledge and research (for example because of a lack of appropriate peer review, poor methodology, or flawed analyses) to inform decision making and policy formulation;
- (b) Misrepresenting the underlying assumptions, uncertainties, or probabilities of scientific products;
- (c) Inappropriately influencing, or politically interfering with, scientific activities and/or resulting scientific products (see Sections 9l and s);
- (d) Inappropriately influencing, or politically interfering with, the release of scientific products (see Sections 9l and s);
- (e) Inappropriately suppressing or censoring the objective communication of findings (data and results) resulting from scientific activities; and/or
- (f) Inappropriately altering or misrepresenting scientific products in public communications.

(2) Compromised scientific integrity also includes research misconduct (see Section 9w). 37

(3) For the purposes of this DM, compromised scientific integrity does not include ethical improprieties and regulatory non-compliance that do not constitute a loss or breach of scientific integrity as described in Section 9bb(1). Examples of such improprieties include but are not limited to: misallocation of funds, sexual harassment, discrimination, and breaches of human subject protections or animal welfare requirements. NOTE: Breaches of human subject protections

or animal welfare requirements should be reported, respectively, to the appropriate Institutional Review Board (IRB) or Institutional Animal Care and Use Committee (IACUC).

Departmental Regulation, DR-1074-001 <https://www.ocio.usda.gov/document/departmental-regulation-1074-001>
PDF of DR: <https://www.ocio.usda.gov/sites/default/files/docs/2012/Final%20-%20DR%201074-001%20Scientific%20Integrity.pdf>

Pg 23 of the DR PDF is the USDA Code of Scientific Ethics, which describes the expected norms of behavior when considering whether there has been a “significant departures from accepted practices of the relevant research community”.

For ease, I have reproduced the Code here:

USDA CODE OF SCIENTIFIC ETHICS

- I dedicate myself to the pursuit, promotion, and advancement of scientific knowledge.
- I will design, conduct, manage, evaluate, and report scientific research honestly and thoroughly, and will disclose any conflicts of interest to my supervisor or other appropriate USDA official(s) for their determination as to whether a recusal, disclaimer, or other appropriate notification would be appropriate.
- I will prevent abuse of all research resources entrusted to me, and will conduct research involving the participation of human subjects and the use of non-human animals in accordance with applicable, established, ethical standards.
- I will not compromise scientific integrity.
- I will make all reasonable efforts to ensure the accuracy of the research record and to correct identified inaccuracies that pertain to my contribution to the research reported in the research record.
- I will not willfully hinder the research of others.
- I will welcome constructive criticism of my scientific research and offer the same to my colleagues in a manner that fosters mutual respect amid objective scientific debate.
- I will recognize, as appropriate,[footnote 8] past and present contributors to my research and will neither accept nor assume unauthorized and/or unwarranted credit for another's accomplishments.
- I will claim authorship for a research product only if I am willing to be held responsible for both the interpretation of the data and the conclusions as presented.
- I will claim authorship for a research product only if I have made a major intellectual contribution (as part of conception, design, data collection, data analysis, or interpretation) and made significant contributions to its preparation (written, reviewed, or edited).
- I will not publish or use the original ideas, unpublished research data, or unpublished findings of others without, as appropriate,[footnote 9] securing written approval or providing acknowledgment.
- I will refrain from duplicative publication of the same research findings as original.
- I will show appropriate diligence toward preserving and maintaining research resources, such as records of data and results that are entrusted to me.

Footnotes 8 and 9:

8 i.e., in accordance with accepted practices of the relevant research community.

9 i.e., in accordance with accepted practices of the relevant research community

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